

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Nickeisha Khadene Lamey Salmon aka Lamey,
Nickeisha Khadene aka Lamey, Nickeisha aka Salmon,
Nickeisha aka Brothers Goods & Services

Debtor

JPMorgan Chase Bank, N.A.

Movant

vs.

Nickeisha Khadene Lamey Salmon aka Lamey,
Nickeisha Khadene aka Lamey, Nickeisha aka Salmon,
Nickeisha aka Brothers Goods & Services

Debtor

Charles J. DeHart, III Esq.

Trustee

CHAPTER 13

NO. 5:14-bk-01589 JJT

Nature of Proceeding: Motion for Relief

REQUEST TO CONTINUE HEARING WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance; both parties are attempting settlement.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: September 19, 2016

/s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire
Attorney for Movant
BNY Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Fax (215) 825-6406